

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KATHLEEN M. JUNGCLAUS,

:

Plaintiff : NO. 17-cv-04462-RK

v.

:

WAVERLY HEIGHTS, LTD.,

:

Jury Trial Demanded

Defendant :

:

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

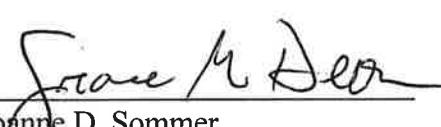
Pursuant to Fed. R. Civ. P. 56, Defendant, Waverly Heights, Ltd., by and through its attorneys, Eastburn and Gray, P.C., hereby moves this Honorable Court to enter summary judgment in favor of Defendant, Waverly Heights, Ltd., and against Plaintiff, Kathleen M. Jungclaus, for the reasons set forth in accompanying Memorandum of Law, incorporated herein by reference.

Respectfully Submitted,

EASTBURN AND GRAY, P.C.

Dated: August 1, 2019

By:


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